

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

ROSY GIRON DE REYES, *et al.*,

*Plaintiffs,*

vs.

WAPLES MOBILE HOME PARK LIMITED  
PARTNERSHIP, *et al.*,

*Defendants.*

Civ. No. 1:16-cv-00563 (LO/TCB)

**PLAINTIFFS' MOTION TO FILE DOCUMENTS UNDER SEAL**

Pursuant to Local Civil Rule 5, Plaintiffs Rosy Giron De Reyes, Jose Dagoberto Reyes, Felix Alexis Bolanos, Ruth Rivas, Yovana Jaldin Solis, Esteban Ruben Moya Yrapura, Rosa Elena Amaya, and Herbert David Saravia Cruz ("Plaintiffs") respectfully move this Court for approval to file under seal Exhibits 3, 4, 5, and 7 to Plaintiffs' Supplemental Brief in Response to the Court's *Sua Sponte* Order. The exhibits consist of documents designated confidential pursuant to the Protective Order (Dkt. 45).

In support of this Motion, Plaintiffs are submitting a non-confidential Memorandum, along with an appropriate Notice and Proposed Order.

[signatures on following page]

Respectfully submitted,

Date: September 7, 2021

\_\_\_\_\_  
//s//

LEGAL AID JUSTICE CENTER

Simon Sandoval-Moshenberg, VSB #77110

*simon@justice4all.org*

Nady Peralta, VSB #91630

*nady@justice4all.org*

Granville Clayton Warner, VSB #24957

*cwarner@justice4all.org*

Larisa Zehr, VSB #96032

*larisa@justice4all.org*

6066 Leesburg Pike, Suite 520

Falls Church, VA 22041

Phone: (703) 778-3450

Fax: (703) 778-3454

*Counsel for Plaintiffs*

**Certificate of Service**

I hereby certify that on this 7th day of September, 2021, I caused the foregoing, along with all attachments thereto, to be filed electronically with the Clerk of the Court using CM/ECF, which will then send a notification of such filing (NEF) to all counsel of record.

\_\_\_\_\_/s/\_\_\_\_\_  
Simon Sandoval-Moshenberg VSB # 77110  
*simon@justice4all.org*  
Legal Aid Justice Center  
6066 Leesburg Pike, Suite 520  
Falls Church, VA 22041  
Tel: (703) 720-5605  
Fax: (703) 778-3454